

NO. UWY-CV-14-6026552-S

NUCAP INDUSTRIES, INC. et al.,	)	SUPERIOR COURT
	)	
Plaintiffs,	)	J.D. OF WATERBURY
	)	
v.	)	
	)	
PREFERRED TOOL AND DIE, INC., et al.,	)	
	)	
Defendants.	)	JANUARY 7, 2016

**PREFERRED DEFENDANTS' COVER SHEET TO OBJECTIONS AND  
RESPONSES TO PLAINTIFFS' SECOND SET OF REQUESTS FOR PRODUCTION**

Pursuant to P.B. 1998 § 13-10(b), Defendants Preferred Tool and Die, Inc. and Preferred Automotive Components (a d/b/a of Preferred Tool and Die, Inc.) (collectively "Preferred" or "Defendant") hereby submit this cover sheet to their objections to Plaintiffs Nucap Industries, Inc. ("Nucap") and Nucap US, Inc.'s ("Nucap US") (collectively "Plaintiffs") December 8, 2015, Second Set of Requests for Production. Defendants have objected in whole or in part to Requests 1-3. Defendants have responded in whole or in part to Requests 1-3.

THE DEFENDANTS  
PREFERRED TOOL AND DIE, INC. and  
PREFERRED AUTOMOTIVE  
COMPONENTS  
BY THEIR ATTORNEY

/s/ Benjamin J. Lehberger /425026

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**ORDER**

The foregoing objections having been heard this \_\_\_ day of \_\_\_\_\_, 2016,  
it is hereby ordered as follows:

1. Objection to Request 1 is SUSTAINED / OVERRULED;
2. Objection to Request 2 is SUSTAINED / OVERRULED;
3. Objection to Request 3 is SUSTAINED / OVERRULED.

\_\_\_\_\_  
Judge/Assistant Clerk

**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing was sent via electronic delivery, pursuant to express written consent, on this 7th day of January, 2016, to all counsel and pro se parties of record, including:

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/s/ Jessica L. White

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Plaintiffs,	)	J.D. OF WATERBURY
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v.	)	
	)	
PREFERRED TOOL AND DIE, INC., et al.,	)	
	)	
Defendants.	)	JANUARY 7, 2016

**DEFENDANTS PREFERRED TOOL AND DIE, INC., AND PREFERRED  
AUTOMOTIVE COMPONENTS' RESPONSES AND OBJECTIONS TO PLAINTIFFS'  
SECOND SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS**

Pursuant to Practice Book § 13-10, Defendants Preferred Tool and Die, Inc, and Preferred Automotive Components (a d/b/a of Preferred Tool and Die, Inc.) (collectively “Preferred” or “Defendant”), by and through their attorneys, hereby respond and object to Plaintiffs Nucap Industries, Inc. and Nucap US, Inc.’s (“Nucap” or “Plaintiffs”) Second Set of Requests for Production of Documents, dated December 8, 2015.

**DOCUMENT REQUESTS**

**REQUEST NO. 1:**

All documents identified, relied on, or referenced in Preferred's response to Plaintiffs' Second Set of Interrogatories to Preferred.

**RESPONSE TO REQUEST NO. 1:**

Defendant objects to this request as duplicative of previous request nos. 2 and 12. Defendant further objects to this request to the extent it calls for documents protected by Conn. Gen. Statute 31-128f.

Subject to these objections, Defendant states that it has produced responsive documents at bates nos. PREFERRED0000103-104.

**REQUEST NO. 2:**

All documents, including but not limited to communications, concerning the personnel file of Carl Dambrauskas for the period when Dambrauskas was employed by Preferred.

**RESPONSE TO REQUEST NO. 2:**

Defendant objects to this request as duplicative of previous request nos. 2 and 12. Defendant further objects to this request to the extent it calls for documents protected by Conn. Gen. Statute 31-128f.

Subject to these objections, Defendant states that it has produced responsive documents at bates nos. PREFERRED0000103-104.

**REQUEST NO. 3:**

All documents concerning the circumstances surrounding Dambrauskas' departure, termination, or resignation from Preferred.

**RESPONSE TO REQUEST NO. 3:**

Defendant objects to this request as duplicative of previous request nos. 2 and 12. Defendant further objects to this request to the extent it calls for documents protected by Conn. Gen. Statute 31-128f.

Subject to these objections, Defendant states that it has produced responsive documents at bates nos. PREFERRED0000103-104.

January 7, 2016  
Dated

/s/Benjamin J. Lehberger/425026

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*ATTORNEYS FOR PREFERRED TOOL AND DIE, INC.  
AND PREFERRED AUTOMOTIVE*

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing DEFENDANTS PREFERRED TOOL AND DIE, INC., AND PREFERRED AUTOMOTIVE COMPONENTS' RESPONSES AND OBJECTIONS TO PLAINTIFFS' SECOND SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS was or will immediately be mailed or delivered electronically or nonelectronically on January 7, 2016 to all counsel and self-represented parties of record and that written consent for electronic delivery was received from all counsel and self-represented parties of record who were or will immediately be electronically served:

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January 7, 2016  
Date

/s/ Jessica L. White